

Todd E. Kennedy, Esq. (Bar No. 6014)
Maximiliano D. Couvillier III, Esq. (Bar No. 7661)

KENNEDY & COUVILLIER, PLLC

3271 E. Warm Springs Rd.

Las Vegas, NV 89120

Tel: (702) 605-3440

Fax: (702) 625-6367

tkennedy@kclawnv.com

mcouvillier@kclawnv.com

Attorneys for Maurice Wooden

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BRENNA SCHRADER, an individual, on
behalf of herself and all others similarly
situated,

Plaintiff,

vs.

STEPHEN ALAN WYNN; an individual;
MAURICE WOODEN, an individual, WYNN
LAS VEGAS, LLC dba WYNN LAS VEGAS
a Nevada Limited Liability, WYNN
RESORTS, LTD, a Nevada Limited Liability
Company; and DOES 1-20, inclusive; ROE
CORPORATIONS 1-20, inclusive,

Defendants.

Case No. 2:19-cv-02159-JCM-BNW

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME FOR
DEFENDANT MAURICE WOODEN
TO RESPOND TO PLAINTIFF'S
COMPLAINT**

(First Request)

Defendant Maurice Wooden ("Mr. Wooden"), by and through his counsel of record, the law firm of Kennedy & Couvillier, PLLC, and Plaintiff Brenna Schrader ("Plaintiff"), by and through her counsel of record, the Richard Harris Law Firm, hereby agree and stipulate, subject to the Court's approval, as follows:

1. Plaintiff filed her Class Action Complaint for Damages ("Complaint") in the Eighth Judicial District Court, Clark County, Nevada on September 26, 2019.

2. Defendants Wynn Las Vegas, LLC and Wynn Resorts, Ltd. removed the action to this Court on December 16, 2019. *See* Notice to Federal Court of Removal of Civil Action from State Court (ECF No. 1).

3. Prior to removal, Plaintiff serve Mr. Wooden on December 12, 2019, with a copy of the Complaint and Summons issued by the state court on or about September 27, 2019.

4. Pursuant to Fed. R. Civ. P. 81, Mr. Wooden's response to the Complaint was otherwise due January 3, 2020.

5. Due to complexity of the matter, the class and collective claims alleged in the Complaint, Mr. Wooden requires additional time to investigate Plaintiff's allegations before responding to the Complaint.

6. On December 27, 2019, Plaintiff agreed to extend the deadline for Mr. Wooden to respond to the Plaintiff's Complaint to February 3, 2020. The parties memorialized such agreement via email between counsel.

7. Plaintiff and Mr. Wooden wish to further and more formally memorialize their agreement for the benefit of the record through the foregoing Stipulation.

8. In light of the foregoing, the parties hereby further agreed to extend any deadline for Mr. Wooden to file an answer or other response to Plaintiff's Complaint [ECF No. 1-1] from January 3, 2020 to and including February 3, 2020.

9. This is the first request for an extension of time for Mr. Wooden to respond to Plaintiff's Complaint.

10. This Stipulation is made in good faith and not for the purpose of delay.

//

//

//

//

//

11. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed as waiving any claim and/or defense held by any party.

Dated: January 15, 2020.

KENNEDY & COUVILLIER, PLLC

RICHARD HARRIS LAW FIRM

/s/Maximiliano D. Couvillier III

/s/Burke Huber

Todd E. Kennedy, Esq. (Bar No. 6014)

Richard Harris, Esq. (Bar No. 505)

Maximiliano D. Couvillier III, Esq. (Bar No. 7661)

Benjamin Cloward, Esq. (Bar No. 11087)

mcouvillier@kclawnv.com

Burke Huber, Esq. (Bar No. 10902)

Ph. 702-605-3440

Ph. 702-444-4444

burke@richardharrislaw.com

Attorneys for Defendant Maurice Wooden

Attorneys for Plaintiff Brenna Schrader

IT IS SO ORDERED

DATED: January 17, 2020



BRENDA WEKSLER

UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I certify that on **January 15, 2020**, I filed the foregoing document using the Court's electronic filing and service system, which provides, which provides electronic service to all registered users, including:

Benjamin Paul Cloward, Esq.

ben@richardharrislaw.com

Burke Huber, Esq.

burke@richardharrislaw.com

Richard A Harris, Esq.

rick@richardharrislaw.com

Attorneys for Plaintiff

Deverie J. Christensen, Esq.

christensend@jacksonlewis.com

Joshua A Sliker, Esq.

joshua.sliker@jacksonlewis.com

Attorneys for Wynn Las Vegas, LLC and Wynn Resorts, Ltd

Tamara Beatty Peterson, Esq.

tpeterson@petersonbaker.com

Attorney for Stephen Alan Wynn

/s/Maximiliano D. Couvillier III

An employee of Kennedy & Couvillier, PLLC